

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

**In re: Ricky Lee Waters  
Susan Lynn Waters  
Debtors**

**Case No. 13-71712-FJS  
Chapter 13**

**OBJECTION TO CONFIRMATION OF THE CHAPTER 13 PLAN  
BY THE STANDING TRUSTEE AND  
NOTICE OF OBJECTION TO CONFIRMATION OF THE CHAPTER 13 PLAN  
BY THE STANDING TRUSTEE AND  
NOTICE OF HEARING**

*OBJECTION TO CONFIRMATION:*

Michael P. Cotter, Chapter 13 Standing Trustee, respectfully objects to confirmation by the Court of a Plan submitted by the above debtors, dated, June 18, 2013, on the following grounds, to-wit:

1. Debtors' Schedule D treats two debts to Bronco FCU which represent credit card debts. Such debts appear to be wholly unsecured despite the apparent cross-collateralization documents. These debts are properly listed on Schedule F rather than Schedule D.
2. Schedule J discloses two student loan debts, each for \$85 per month. Based on Debtors' testimony at the meeting of creditors, one is a duplicate and should be deleted.
3. Debtors' proposed Plan includes a step decrease due to "expected tolls to begin 1/2014." Such step decrease is based on an uncertain event which may or may not occur in the future. The Trustee objects to this step decrease.
4. Debtors propose to retain a certain motor home (used for pleasure) with a lien in excess of \$20,000. Trustee objects to Debtors' retention of such home and submits that such is neither necessary nor reasonable for the Debtors' rehabilitation.

WHEREFORE, the Standing Trustee objects to confirmation of the proposed Chapter 13 Plan.

Michael P. Cotter VSB No. 19526  
Chapter 13 Standing Trustee  
870 Greenbrier Circle, Suite 402  
Chesapeake, VA 23320  
(757) 961-3000

*NOTICE OF OBJECTION TO CONFIRMATION:*

Michael P. Cotter, Chapter 13 Standing Trustee, has filed papers with the Court objecting to confirmation of your Chapter 13 Plan dated, June 18, 2013, which was filed in this bankruptcy case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then you or your attorney must:

**Attend the HEARING** scheduled to be held on **July 9, 2013 at 10:00 a.m..** The hearing will be held in Courtroom Two, Fourth Floor, United States Bankruptcy Court for the Eastern District of Virginia, Norfolk Division, 600 Granby Street, Norfolk, Virginia.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Local Bankruptcy Rule 3015-2(D)(3) provides that as soon as possible after the filing of an objection, counsel are directed to communicate in an effort to settle the objection well in advance of any scheduled hearing on objection to confirmation.

Michael P. Cotter VSB No. 19526  
Chapter 13 Standing Trustee  
870 Greenbrier Circle, Suite 402  
Chesapeake, VA 23320  
(757) 961-3000

*NOTICE OF HEARING ON OBJECTION:*

**NOTICE IS HEREBY GIVEN** that a **HEARING** on the foregoing Objection to Confirmation will be convened on **July 9, 2013 at 10:00 a.m.** The hearing will be held in Courtroom Two, Fourth Floor, United States Bankruptcy Court for the Eastern District of Virginia, Norfolk Division, 600 Granby Street, Norfolk, Virginia.

/s/ Michael P. Cotter  
Michael P. Cotter  
Chapter 13 Standing Trustee

**CERTIFICATION**

I hereby certify that a copy of this Objection to Confirmation, and Notice was mailed on June 21, 2013, to attorney for the debtors , Steve C Taylor, Esquire, 133 Mt Pleasant Rd, Chesapeake, VA 23322; and to the debtors, Ricky Lee Waters & Susan Lynn Waters, 4532 Exeter Dr, Suffolk, VA 23434.

/s/ Michael P. Cotter  
Michael P. Cotter  
Chapter 13 Standing Trustee

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